

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a	§	
BRAZOS LICENSING AND	§	
DEVELOPMENT,	§	
Plaintiff,	§	
v.	§	CIVIL ACTION NO. 6:20-cv-543-ADA
HUAWEI INVESTMENT & HOLDING	§	JURY TRIAL DEMANDED
CO., LTD., HUAWEI TECHNOLOGIES	§	
CO., LTD., HUAWEI TECHNOLOGIES	§	
USA INC., HUAWEI DEVICE CO. LTD.	§	
(F/K/A HUAWEI DEVICE (DONGGUAN)	§	
CO.), HUAWEI DEVICE (SHENZHEN)	§	
CO., LTD. (F/K/A HUAWEI DEVICE CO.,	§	
LTD.), HUAWEI DEVICE USA, INC.	§	
Defendants.	§	

PLAINTIFF'S ANSWER TO DEFENDANTS' FIRST AMENDED COUNTERCLAIMS

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development hereby submits its Answer to Defendants' First Amended Counterclaims ("Counterclaims"). Plaintiff denies all allegations in the Counterclaims not specifically admitted below. In responding to the Counterclaims, Plaintiff uses headings employed by Defendants strictly as a convenience to the Court and does not admit any allegation made in, or inference suggested by, such headings. Plaintiff answers the numbered paragraphs of the Counterclaims as follows:

THE PARTIES AND NATURE OF THE ACTION

1. Plaintiff admits the allegations in paragraph 1 of the Counterclaims.
2. Plaintiff admits only that Huawei Technologies USA is a corporation organized and existing under the laws of Texas that maintains an established place of business at 2391 NE

Interstate 410 Loop, San Antonio, TX 78217. Otherwise, Plaintiff denies the allegations in paragraph 2 of the Counterclaims.

3. Plaintiff admits the allegations in paragraph 3 of the Counterclaims.

4. Plaintiff admits only that the Counterclaims speak for themselves. Otherwise, Plaintiff denies the allegations in paragraph 4 of the Counterclaims and denies that Defendants are entitled to the relief they request.

JURISDICTION AND VENUE

5. Plaintiff admits that this Court has jurisdiction over Plaintiff's claims. Otherwise, denied.

6. Plaintiff admits that this Court has jurisdiction over Plaintiff's claims. Otherwise, denied.

7. Plaintiff admits venue is proper in this Court. Otherwise, denied.

COUNT I – DECLARATION OF INVALIDITY OF THE '627 PATENT

8. To the extent a response is required to paragraph 8 of the Counterclaims, denied.

9. Plaintiff admits a judicial controversy has arisen concerning Defendants' infringement of the patent-in-suit. Otherwise, denied.

10. Plaintiff denies the allegations in paragraph 10.

11. Plaintiff denies the allegations in paragraph 11.

12. Plaintiff denies the allegations in paragraph 12.

13. Plaintiff denies the allegations in paragraph 13.

COUNT II – DECLARATION OF NON-INFRINGEMENT OF THE '627 PATENT

14. To the extent a response is required to paragraph 14 of the Counterclaims, denied.

15. Plaintiff admits a judicial controversy has arisen concerning Defendants' infringement of the patent-in-suit. Otherwise, denied.

16. Plaintiff denies the allegations in paragraph 16.

17. Plaintiff denies the allegations in paragraph 17.

18. Plaintiff denies the allegations in paragraph 18.

19. Plaintiff denies the allegations in paragraph 19.

JURY DEMAND

Plaintiff admits this paragraph contains a demand for jury trial to which no response is required.

PRAYER FOR RELIEF

Plaintiff denies any factual assertions in the Request for Relief and further denies that Defendants are entitled to any of the relief sought in the Request for Relief.

All allegations in Defendants' counterclaims that are not specifically admitted herein are denied.

Dated: November 3, 2020

Respectfully submitted,

/s/ Ryan S. Loveless

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on November 3, 2020 the foregoing document was served upon all counsel of record via the court's electronic filing system in accordance with the Federal Rules of Civil Procedure.

/s/ Ryan S. Loveless

Ryan S. Loveless